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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF JEFF NARDINELLI**

1 I, Jeffrey W. Nardinelli, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an associate with Quinn  
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC (“Waymo”). I make this  
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and  
5 would testify competently as follows.

6 2. Attached as Exhibit 1 is a true and correct copy of excerpts of the deposition of  
7 Gary Brown, taken March 24, 2017.

8 3. Attached as Exhibit 2 is a true and correct copy of an email chain between Jeff  
9 Nardinelli and Arturo González beginning April 10, 2017.

10 4. Attached as Exhibit 3 is a true and correct copy of an email sent by Jeff Nardinelli  
11 on September 2, 2017.

12 5. Attached as Exhibit 4 is a true and correct copy of excerpts of the deposition of  
13 Sasha Zbrozek, taken September 6, 2017.

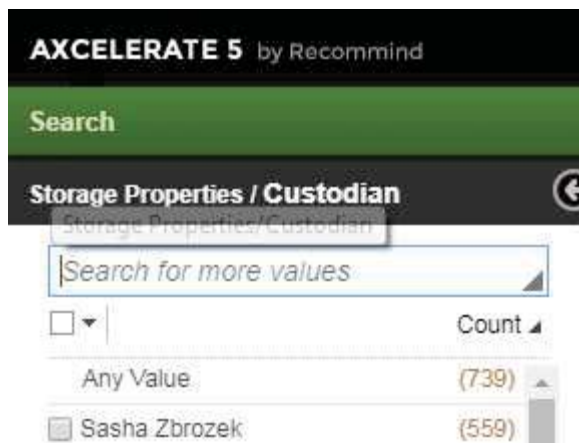
14 6. Attached as Exhibit 5 is a true and correct copy of excerpts of the deposition of  
15 Michael Janosko, taken March 23, 2017.

16 7. Attached as Exhibit 6 is a true and correct copy of excerpts from Waymo’s  
17 Responses and Objections to Otto Trucking’s Fourth Set of Requests for Production, served  
18 August 24, 2017.

19 8. Attached as Exhibit 7 is a true and correct copy of an email sent by Jeff Nardinelli  
20 on June 27, 2017.

21 9. Below is a screenshot from Waymo’s document-production platform. The  
22 screenshot shows that Waymo has produced 739 unique documents containing the term “Zbrozek”  
23 including 559 documents from Mr. Zbrozek’s custodial file.

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25  
26  
27  
28



I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

DATED: September 13, 2017

*/s Jeff Nardinelli*

Jeff Nardinelli

**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Jeff Nardinelli.

/s/ Charles K. Verhoeven  
Charles K. Verhoeven